

August 19, 2018

Letter of Appeal  
Ms. Marlene H. Dortch  
Federal Communication Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: In the Matter of Request for Review of the Universal Service Administrator, Schools and Libraries Universal Service Support Mechanism.  
CC Docket No.02-6

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In re:  
Billed Entity Number:  
Appellant: E rate Solutions Group  
Applicant: Arrow Child and Family Ministries BEN 16069190  
Fund Year: 2017 FCC Form 471: 171010261 (category 1)

Dear Ms. Dortch:

This is a "Letter For a Waiver of the time to submit information for an Appeal.  
Apps Fund Year: 2017 FCC Form 471: 171010261 (category 1) due to the following:

- 1) The Appeal was processed on June 23, 2018 despite being on Summer Deferral as the reviewer performed the review outside of EPC
- 2) The Appeals reviewer was requesting information outside of EPC (see enclosed) from a Solix email account which was not operational at the time of the review.
- 3) The requested information was sent to the E Rate coordinator prior to the application being processed, but the email address in the reviewer's email was incorrect – see enclosed....which prevented correspondence from the E Rate coordinator.
- 4) The corrected discount letter (see original/submitted with the appeal and revised letter enclosed) - only contained data entry/typo corrections to some of the BEN #'s.
- 5) The corrected information was also on file from information submitted during PIA – see enclosed Dec. 2017 letter.
- 6) The FCC Waiver/Appeal was delayed due to the delay from USAC in deciding whether an Appeal reconsideration could be made.

In addition there were various inherent flaws in USAC's EPC system as described in detail in Chairman Pai's April 18, 2017, letter to Chris Henderson of USAC, the USAC EPC ("Epic") Portal system, and USAC as a whole, have "serious flaws." For example:

The Chairman specifically instructed USAC to “identify alternative options to assist applicants even in the event of IT failures.” In our case, such IT failures and other numerous problems evident in the USAC system and structure have prevented our initial PIA response

Therefore we are formally requesting a reconsideration of our appeal so that the information that was available before the RFCDL was issued could be submitted.

I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,

*Katherine M. Weiss*

Consultant

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